

July 30, 1999

DOCKETS MANAGEMENT BRANCH (HFA-305)  
FOOD AND DRUG ADMINISTRATION  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

2240 '99 AUG -3 A10:15

Re: Docket # 98N-1230; Docket # 96P-0418; Docket # 97P-0197

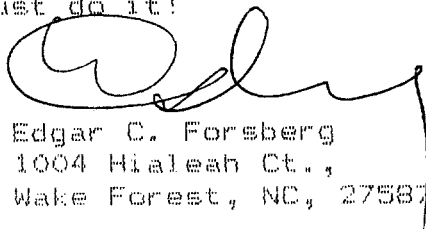
The FDA has the jurisdiction and the mandate to ban all practices in the husbandry of food animals which can be shown to be injurious to human health. The forced molting of chickens, currently a standard practice within the U.S. egg industry, has been shown to seriously impair the hens' immune systems, greatly heightening their already-acute vulnerability to *Salmonella enteritidis*.

Simply putting bacteria warning labels on egg cartons, or regulating refrigeration temperatures, falls far short of any meaningful or effective exercise of the FDA's responsibilities.

The use of such production methods as forced molting; the crowding of too many chickens into the so-called "laying battery" cages; the painful excising of beaks without benefit of anaesthesia; all are practices which should be abhorrent to any society calling itself humane. However, human greed being what it is, there is no shortage of "businessmen" and "farmers" who are quite willing to abandon the ancient covenant which formerly governed the care of domestic animals in order to achieve what they term "efficiency."

But interestingly enough, those of us who follow developments in animal husbandry have noted a growing preponderance of good, solid scientific research showing that inhumane practices in food animal husbandry tend also to increase the development of pathogens which threaten the health of human consumers. Thus, our ethical values having fallen short in the achievement of a humane society, we now find ourselves being led to the same goal through the back door, as it were, by protecting our health. While this seems an ironical twist, we who promote animal welfare will take it any way we can get it.

In April, 1998, the FDA was petitioned to enact a ban on forced molting. I urge the FDA most emphatically to grant this petition without further delay. Just do it!

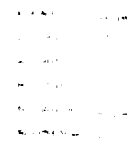


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96P-0418

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CROSS FILE SHEET

File Number: 98N-1230/ C 3 2

See File Number: 97P-0197/ C 3 3

96P 0418/ C 3 2